

COVINGTON & BURLING LLP

BEIJING BRUSSELS LONDON NEW YORK
SAN DIEGO SAN FRANCISCO SEOUL
SHANGHAI SILICON VALLEY WASHINGTON

ANDREW A. RUFFINO
THE NEW YORK TIMES BUILDING
620 EIGHTH AVENUE
NEW YORK, NY 10018-1405
T 212.841.1097
aruffino@cov.com

November 3, 2014

By ECF & FACSIMILE

Honorable Naomi Reice Buchwald
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *In re: LIBOR-Based Financial Instruments Antitrust Litigation*,
Case No. 1:11-md-2262 (NRB)

Dear Judge Buchwald:

This firm is counsel to Citigroup Inc. and Citibank, N.A., which are defendants in the above-referenced matter.

Isaac Belfer, one of your former law clerks, joined Covington & Burling LLP (“Covington”) today as an associate in the firm’s Washington office. I am writing pursuant to Rule 1.12 of the New York Rules of Professional Conduct, which (a) bars a former law clerk from representing a client in connection with a matter in which he or she participated personally and substantially while clerking, and (b) describes notification and screening requirements that must be put in place to ensure that the former law clerk does not share information regarding the matter with others at the firm. This letter describes Covington’s compliance with the requirements of Rule 1.12.

Mr. Belfer will not participate in the Covington representation listed above. Lawyers and non-lawyer personnel within Covington have been notified that they may not seek his assistance in Covington’s activity with respect to these matters, discuss these matters with him or in his presence, pose hypothetical questions to him based on the facts of these matters, or otherwise seek to utilize his knowledge, experience, or assistance in these matters or in any other matter related thereto. Mr. Belfer is not permitted to share information about these matters with others at Covington (other than as has been necessary to identify the matters appropriate for screening), and will be apportioned no part of the fee therefrom.

COVINGTON & BURLING LLP

November 3, 2014

Page 2

If the Court requires any additional information concerning this matter, please let me know, and we will be happy to provide it.

Respectfully,

s/ Andrew A. Ruffino

Andrew A. Ruffino

*Counsel for Defendants Citigroup
Inc. and Citibank, N.A.*

cc: All Counsel (by ECF)